

**State of Wisconsin**  
**Before the Government Accountability Board**

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GOVERNMENT  
ACCOUNTABILITY BOARD

The Response of  
REPUBLICAN ASSEMBLY CAMPAIGN COMMITTEE

Jennifer Toftness, Respondent on behalf of Russell Goodwin

In re: the Nomination Papers of: Candidate Russell Goodwin, 12<sup>th</sup> Assembly District

Joel Gratz, Complainant

**VERIFIED RESPONSE**

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This response is under Chapter 8 of the Wisconsin Statutes and GAB 2 of the State of Wisconsin Administrative Code. I, Jennifer Toftness allege that:

1. I am a resident of the State of Wisconsin, a qualified elector, and the Executive Director of the Republican Assembly Campaign Committee with a mailing address of 148 East Johnson Street, Madison, Wisconsin 53703.
2. On June 4, 2014, Joel Gratz, Executive Director of the Assembly Democratic Campaign Committee, submitted a verified complaint to the GAB alleging my nomination papers contained approximately 153 signatures with insufficiencies.

COMPLAINANT FAILS TO PROVIDE SUPPORTING EVIDENCE FOR HIS  
ALLEGATIONS. THEREFORE, COMPLAINT SHOULD BE DISMISSED.

3. GAB Administrative Code 2.05(3)(a) states, in part, the following: "The burden is on the challenger to establish any insufficiency."
4. GAB Administrative Code 2.05(5) states the following: "Where it is alleged that the signer or circulator of a nomination paper does not reside in the district in which the candidate being nominated seeks office, the challenger may attempt to establish the geographical location of an address indicated on a nomination paper, by providing district maps, or by providing a statement from a postmaster or other public official."
5. Complainant fails to meet the standard established by GAB 2.05(5), and provides no supporting documentation that the signatories listed are outside the 12<sup>th</sup> Assembly District.
6. Complainant further fails to provide the addresses that are allegedly outside the 12<sup>th</sup> Assembly District.
7. Complainant includes several signatories that, through his own admission, are in 12<sup>th</sup> Assembly District. This includes the following signatories:

- Date: June 9, 2014.

*Jennifer A. Hofness*  
Jennifer Hofness  
Republican Assembly Campaign Committee


I, Jennifer Toftness, hereby certify on this 9 day of June, 2014, a true and correct copy of this complaint was forwarded via electronic email to the address for Joel Gratz on file with the GAB.

*Jennifer A. Toftness*  
Jennifer Toftness

STATE OF WISCONSIN                   )  
   ) ss.  
County of Dane                         )

Sworn to before me this 9<sup>th</sup> day of June, 2014.

Sworn to before me this 1 day of June



\_\_\_\_\_

My commission expires \_\_\_\_\_ or is permanent

